

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA**

DANIEL C. FLINT et.al.,	:	
	:	No. 3:19-cv-00189-FDW-DCK
Plaintiff,	:	
	:	
v.	:	
	:	
ALLY FINANCIAL INC., et.al.,	:	
	:	
Defendants.	:	
	:	

**DEFENDANT ALLY FINANCIAL INC.'S
MOTION TO STRIKE CLASS ALLEGATIONS**

Defendant Ally Financial Inc., (“Ally”), by counsel, submits its Motion to Strike Class Allegations (“Motion”) pursuant to Rules 23(c)(1) and 23(d)(1)(D) of the Federal Rules of Civil Procedure against the First Amended Complaint (“Complaint”) filed by Plaintiff Daniel C. Flint.

For the reasons set forth more fully in the accompanying Memorandum in Support, Ally respectfully requests that the Court grant Ally’s Motion because individual issues outweigh any issues that may be in common to the purported class and an inherent conflict exists between Plaintiff’s proposed role as class representative and his proposed role as lead class counsel, strike the Complaint’s class allegations, and grant Ally such other and further relief as this Court deems appropriate and just.

Dated: July 22, 2019

Respectfully submitted,

ALLY FINANCIAL INC.

By: /s/ Keaton C. Stoneking
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